



specifically explain why you believe the request is vague and should state your understanding of the information being sought along with a response consistent with your understanding.

5. For every page produced to DESC that contains confidential information, the page is to be marked “CONFIDENTIAL” in the header. Any specific information which you designate as confidential information must also be marked by notation, highlighting, or other conspicuous means.

6. “Party” is defined as the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

### **Document and Information Requests**

**DESC 1-1.** Please provide a list of the names of the witnesses the Party intends to call and the subject matter for which each witness intends to testify at the hearing in this matter, including but not limited to expert witnesses and witnesses that the Party intends to use to provide surrebuttal testimony, if any.

**DESC 1-2.** Please provide an electronic copy in the original format—i.e., Excel (with all formulas intact) or Word—of the exhibits and appendices attached to any filed testimony of all witnesses.

**DESC 1-3.** Please provide copies of any correspondence, requests for information, and responses, oral or written, including but not limited to those made or received in electronic format, to or from any other party in this docket.

**DESC 1-4.** Please provide copies of all source documents, articles, cited documents listed in footnotes, regulatory decisions, and other sources used in the development and preparation of the testimony, exhibits, and appendices of the written testimony of any expert witness for whom the Party has filed or will file written testimony in this case.

**DESC 1-5.** Please provide Microsoft Excel copies (with formulas intact) of any and all and supporting documents, data, tables, charts, source documents, and regression results and statistical tests used in the development and preparation of the testimony, exhibits, and appendices of any witness for whom the Party has filed or will file written testimony in this case.

**DESC 1-6.** Please provide (or identify if provided to you by DESC) copies of all documents, analyses, articles, reports, regulatory decisions, and other materials provided by you to any expert witness for whom the Party has filed or will file written testimony in this case.

**DESC 1-7.** Please provide in original format—i.e., pdf, Excel (with all formulas intact), or Word—all documents, analyses, articles, reports, regulatory decisions, and other materials supporting the written testimony of any witness that analyzes, discusses, or proposes adjustments to any of the calculations, adjustments, amounts, or other information set forth in the Application or otherwise proposed by the Company.

**DESC 1-8.** Please provide copies of any and all responses provided or received by the Party in this proceeding to any party or intervenor (other than DESC) in response to any interrogatory or request for the production of documents and things.

**DESC 1-9.** Please provide copies of any and all responses provided or received by the Party with respect to a subpoena issued in this proceeding.

**DESC 1-10.** As to each outside witness appearing on your behalf in this proceeding and for each regulatory proceeding in which that witness has appeared during the past three years, please identify the proceeding, and provide any and all reports, prefiled testimony, hearing transcripts, all associated exhibits, and a citation to the resulting orders on the merits.

**DESC 1-11.** As to each outside witness appearing on your behalf in this proceeding and for each regulatory proceeding in which that witness has appeared during the past three years,

please identify the proceeding, and provide any and all reports, prefiled testimony, hearing transcripts, all associated exhibits, and a citation to the resulting orders on the merits where the witness took a position different from or contrary to the position taken in this proceeding.

Respectfully submitted,

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